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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91222651
Party	Plaintiff Swiss Army Brand Ltd., Wenger S.A., Victorinox AG, Victorinox Swiss Army, Inc
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Signature	/David Weild III/
Date	09/16/2015
Attachments	Answer to Counterclaim.pdf(93221 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Swiss Army Brand Ltd.,
Wenger S.A.,
Victorinox AG,
Victorinox Swiss Army, Inc.

Opposers,

-v-

Swiza S.A.,

Applicant.

Opposition No. : 91222651

Serial No. : 86/423,254

Published : March 10, 2015

Trademark : **SWIZA (Stylized)**

ANSWER TO COUNTERCLAIM FOR CANCELLATION

Swiss Army Brand Ltd., a Delaware corporation having an address at 7 Victoria Drive, Monroe, Connecticut 06468, United States; Wenger S.A., a Switzerland corporation, having an address at Route de Bale 63, Delémont CH-2800, Switzerland; Victorinox AG, a Switzerland corporation, having an address at Schmiedgasse 57, CH-6438, Ibach-Schwyz, Switzerland; and Victorinox Swiss Army, Inc., a Delaware corporation having an address at 7 Victoria Drive, Monroe, Connecticut 06468, United States (collectively, “Opposers”) answer the correspondingly numbered paragraphs of the Counterclaim for Cancellation filed by Swiza S.A. (“Applicant”) as follows:

1. To the extent a response is required to this paragraph, Opposers deny the same.
2. Admitted.
3. Denied.
4. The allegations of paragraph four require a conclusion of law. To the extent a response is otherwise required to this paragraph, Opposers deny the same.

5. Denied.

6. Denied.

7. Opposers admit that Wenger S.A. is the owner of U.S. Reg. Nos. 3,769,824; 4,230,244; 3,291,272; and 3,291,266. Opposers deny that each of these registrations cover “computer carrying cases in Class 9; bags, cases, and small leather goods in Class 18; and clothing products in Class 25.” Opposers deny that these registrations cover “services.”

8. Denied.

9. The allegations of paragraph nine require a conclusion of law. To the extent a response is otherwise required to this paragraph, Opposers deny the same.

10. Denied.

11. Denied.

12. Denied.

WHEREFORE, Opposers respectfully request that the Counterclaim be denied, that their Opposition be sustained, and the application for registration for Applicant's SWIZA mark be in all respects denied.

Respectfully submitted,

SWISS ARMY BRAND LTD.
WENGER S.A.
VICTORINOX AG
VICTORINOX SWISS ARMY, INC.

Dated: September 16, 2015

By: /David Weild III/

David Weild III
H. Straat Tenney
Danielle E. Gorman

Locke Lord LLP
750 Lexington Avenue
New York, NY 10022

Attorneys for Opposers

CERTIFICATE OF SERVICE

I hereby certify that I am over the age of 18 years, not a party to this action, and that on the -
16th day of September, 2015, I caused to be served a true and correct copy of the foregoing
ANSWER TO COUNTERCLAIM FOR CANCELLATION by first-class mail and electronic mail
to the following attorney for the Applicant:

BASSAM N. IBRAHIM
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ALEXANDRIA, VIRGINIA 22313-1404
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I further certify under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY
September 16, 2015

By: /Danielle E. Gorman/
Danielle E. Gorman